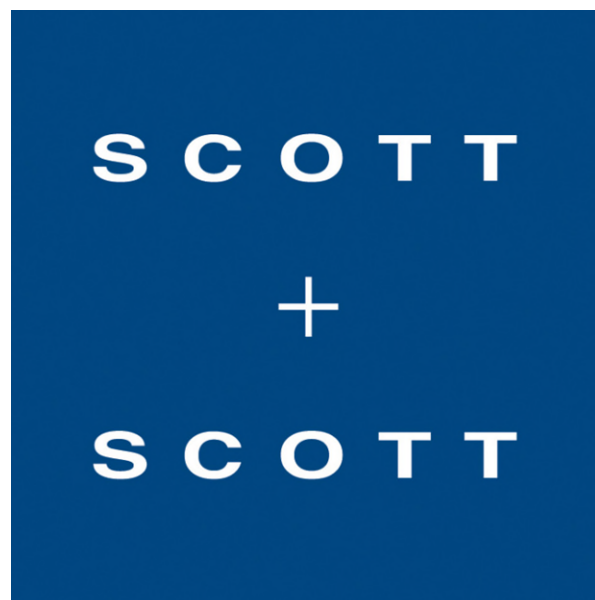


Exhibit 3



FIRM RESUME

www.scott-scott.com



Scott+Scott specializes in the investigation and prosecution of complex actions across the globe – recovering billions for its clients. The Firm has extensive experience litigating securities fraud, antitrust, consumer and other complex cases and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional, and multinational clients in US, UK, and EU courts, offering a one-stop shop for international recoupment.



THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust and other commercial actions in both the United States and Europe. Today, the Firm is comprised of more than 135 team members, including more than one hundred attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators.

Scott+Scott's largest offices are in New York, N.Y. and San Diego, C.A., with additional U.S. offices located in Connecticut, Virginia, Ohio, and Arizona. The Firm's European offices are currently located in London, Amsterdam, and Berlin.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, having served as court-appointed lead or co-lead counsel in numerous securities, antitrust, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents large investors and numerous corporations in commercial and other litigation in courts within the European Union (EU) and the United Kingdom.

Scott+Scott's attorneys are recognized experts and leaders in complex litigation and corporate governance. They have been regular speakers on CLE panels as well as at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives. The Firm's vast experience in structured debt financial litigation has also enabled us to provide clients with in-depth monitoring of their structured finance products, which often come with substantial undisclosed risks due to investors' limited ability to assess what they are acquiring. The Firm also has experience evaluating and monitoring for our clients' debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives.



NON-TRADITIONAL RECOVERY MONITORING

Scott+Scott monitors clients' portfolios to ensure that public funds can recover assets when recourse under the "traditional" securities laws is unavailable. Increasingly, clients are suffering losses from conduct that is not subject to the federal securities laws, for example, when banks conspire to manipulate the operation of the financial markets. Federal courts have appointed the Firm to leadership positions in antitrust class cases relating to anticompetitive conduct to manipulate the foreign currency market, the LIBOR rate, and the ISDAfix rate. In these instances, a fund needs to have a system in place that monitors for these types of situations and enables trustees to make informed decisions on the "non-traditional" remedies available to protect their fund's interests. Such a system requires monitoring counsel to have an in-depth understanding of the U.S. antitrust laws, foreign laws and procedures, and securitization issues. Scott+Scott is on the forefront of obtaining substantial recoveries for its fund clients through the use of these "non-traditional" methods.



“OPT-OUT” LITIGATION

In addition to its class action work, Scott+Scott also represents clients in opt-out antitrust litigation. The Firm’s success in class actions allows it to provide its opt-out clients unique and valuable insights. Representative clients include Parker Hannifin Corporation, PolyOne Corporation, Eastman Kodak Company, and Fujifilm Manufacturing U.S.A., Inc., in the following matters:

- *In re: Aluminum Warehousing Antitrust Litig.*, MDL No. 2481 (S.D.N.Y.);
- *In re Rubber Chemicals Antitrust Litig.*, MDL No. 1648 (N.D. Cal.);
- *In re Polychloroprene Rubber (CR) Antitrust Litig.*, MDL No. 1642 (D. Conn.); and
- *In re Plastic Additives Antitrust Litig.* (No. II), MDL No. 1684 (E.D. Pa.).



INTERNATIONAL LITIGATION

Since the Supreme Court's decision in *Morrison v. Nat'l Austl. Bank Ltd.*, No. 08–1191 (2010), pension funds are seeing increased monitoring activity in foreign jurisdiction litigation. United States funds are making increased investments in foreign companies trading on foreign exchanges, including the emerging markets. These companies are not immune to suffering the effects of fraud. Again, a fund needs to have a system in place to ensure that it learns about these situations and has an action plan to make sure that assets are protected. In the context of a foreign company, this is particularly important given changes in the U.S. securities laws. Notably, many foreign jurisdictions require funds to take affirmative steps to participate in foreign cases and recover losses.

Scott+Scott has experience in foreign jurisdiction litigation and can help funds navigate that process, so funds can participate, if they choose, and recover losses. The Firm is able to monitor and evaluate cases filed in non-U.S. jurisdictions and gauge our clients' ability to participate in those cases. The Firm is currently litigating and assessing cases in Europe, as well as Australia and Canada. However, because many foreign jurisdictions require plaintiffs to "opt-in" from the onset of the litigation, it usually requires participation at the beginning of an action to participate in any recovery.

SCOTT+SCOTT LONDON

Scott+Scott's London office specializes in pursuing violations of European securities and antitrust laws. The Firm's European clients are primarily multinational corporations who have suffered losses across multiple jurisdictions. Scott+Scott London works closely with the Firm's U.S. and Amsterdam-based offices to deliver integrated multi-jurisdictional strategies.

Because its legal team is highly experienced in assessing business cartel damages, Scott+Scott London has been retained by several large international companies to recover losses caused by a decade-long and worldwide business cartel to fix the prices and allocate markets in the cables sector.

Additionally, Scott+Scott London is acting for Michael O'Higgins FX Class Representative in bringing a collective action in the U.K.'s Competition Appeal Tribunal on behalf of victims of the foreign exchange cartel in Europe. The action is brought against five of the world's leading banks (Barclays, Citibank, JPMorgan, RBS, and UBS) and is one of only a handful of actions brought using the U.K.'s new regime for class actions for victims of breaches of competition law.

Scott+Scott has also brought more than 20 claims in London's High Court against Visa and MasterCard in relation to their anticompetitive multilateral interchange fees, acting for



multinational retailers, U.K. household names, and several hotel chains. Scott+Scott London is also working closely with the Firm's U.S.-based offices for Kodak in litigation in the U.K. and United States in relation to anticompetitive conduct involving aluminium warehousing.

SCOTT+SCOTT AMSTERDAM

The Netherlands has a robust litigation regime and is a premier jurisdiction for private enforcement cases. Its courts are increasingly friendly to parties seeking damages from price fixing and other forms of wrongdoing. The Netherlands also offers a mechanism for settling cases on a global basis. U.S. investors can now seek compensation for losses outside the United States without having to engage third-party Dutch law firms.

Our presence there provides our clients, whether headquartered in the U.S. or Europe, a one-stop shop for global recoupment. In the wake of billions of dollars of recent fines imposed by the EU antitrust regulator, Scott+Scott Amsterdam is currently reviewing claims on behalf of multi-national corporations against the world's largest truck-makers, including MAN, DAF, Daimler, Iveco, and Volvo/Renault, for colluding to coordinate prices and pass on the costs of emission-reducing technologies.

SCOTT+SCOTT BERLIN

Scott+Scott Berlin opened in November 2020. The office is led by private enforcement expert Markus Hutschneider who joined the firm from Deutsche Bahn, where he headed that multinational company's team of lawyers in the competition litigation unit. Hutschneider has worked on several high-profile cases involving the German rail track cartel, the air cargo cartel, and the trucks cartel. He also has experience negotiating out-of-court settlements.

Germany is one of the leading European markets for manufacturing and business and one of the top jurisdictions for corporations and other large clients seeking to recover their losses from price-fixing cartels and other wrongdoing. Opening the Berlin office further enhances the firm's ability to be out in front of the developing antitrust and regulatory environment in Germany and in the EU, allowing Scott+Scott to better serve its multinational clients' complex litigation needs, including for cartel damages claims. Scott+Scott Berlin is currently advising large clients on metal packaging in light of commission investigation.



INVESTIGATIONS

Our internal investigations unit is unmatched in its sophistication and ability to identify, connect with, and obtain vital information from witnesses. The Firm's in-house investigative department is led by an attorney with over a decade of legal and investigative experience. Under his direction, the Firm's investigative team employs public record databases, in-person interviews, and forensic IT to unravel complex cases, discover critical evidence and deliver other actionable information.

The team's investigations have played a key role in connection with dozens of litigations and the recovery of hundreds of millions, if not billions, of dollars on behalf of aggrieved investors, as a result of their efforts in identifying, interviewing, and working with key witnesses, and in otherwise obtaining critical evidence and other information. For example, the Firm's investigative department's work has played a pivotal role in helping the Firm achieve noteworthy settlements on behalf of its clients in the following cases, to name just a few:

In re GSE Bonds Antitrust Litig., No. 19-cv-01704 (S.D.N.Y.) (\$386.5 million settlement), and *In re Equifax, Inc. Customer Data Security Breach Litig.*, No. 1:17-md-02800 (N.D. Ga.) (\$32.5 million settlement).



ACCOLADES

U.S. News & World Report “Best Law Firms”

The Firm is currently ranked by U.S. News & World Report as a “Best Law Firm” in commercial litigation in the New York region.

American Antitrust Institute

The 2018 Antitrust Annual Report recognized *In re Foreign Currency Benchmark Rates Antitrust Litigation* as the #1 settlement of 2018, as well as ranking the Firm #1 nationally for aggregate settlements: 2013-2018.

Global Competition Review

At the 6th Annual Global Competition Review (“GCR”) Awards, Scott+Scott won for Litigation of the Year – Cartel Prosecution, which recognized the Firm’s efforts in the foreign exchange settlements in the United States, a landmark case in which major banks conspired to manipulate prices paid in the \$5.3 trillion-per-day foreign exchange market and have thus far settled for more than \$2 billion.

Law 360 Glass Ceiling Report

Scott+Scott is recognized as one of the top law firms in the nation for female attorneys by the legal publication Law360. The Glass Ceiling Report honors firms that “are demonstrating that the industry’s gender diversity goals can turn into a measurable result and boost the number of women at all levels of a law firm.”^{1, 2} This selection highlights the importance Scott+Scott places on diversity and inclusion within the Firm.

Center for Constitutional Rights

Scott+Scott was the recipient of the 2010 Center for Constitutional Rights’ Pro Bono Social Change Award for its representation of the Vulcan Society, an association of African-American firefighters, in challenging the racially discriminatory hiring practices of the New York City Fire Department.

¹ <https://www.law360.com/articles/1310926>

² <https://www.law360.com/articles/1162859/the-best-law-firms-for-female-attorneys>.

WORLD-CLASS ATTORNEYS

We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the UK's CAT and High Courts, and received virtually every accolade offered in our profession.





ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

Managing Partner David R. Scott represents multinational corporations, hedge funds, and institutional investors in high-stakes, complex litigation, including antitrust, commercial, and securities actions.

ADMISSIONS

States of New York, Pennsylvania, and Connecticut; United States Tax Court; United States Courts of Appeal: Second, Third, and Fifth Circuits; United States District Courts: Southern District of New York, Connecticut, Eastern District of Pennsylvania, Northern and Southern Districts of Texas, and Colorado

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989); St. Lawrence University (B.A., cum laude, 1986)

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott with offices in New York, Amsterdam, London, Berlin, California, Connecticut, Virginia, Arizona, and Ohio.

In addition to managing the firm's lawyers worldwide, Mr. Scott advises some of the world's largest multinational corporations in cartel damages and other complex matters. He has been retained to design corporate policies for the global recoupment of losses, and transatlantic private enforcement programs.

He currently represents multinational companies and hedge funds in cases involving, among other things, price-fixing in the trucks, foreign exchange, high voltage power cables, cardboard, and payment card sectors.

Mr. Scott's antitrust cases in the United States have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Cap. Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for \$590.5 million. He was lead counsel in *Red Lion Med. Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda,



one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has been elected to Who's Who Legal: Competition 2015- 2020, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015. In addition, Mr. Scott is continually recognized in the U.S. by Best Lawyers and Super Lawyers.

In addition to his extensive competition law work, Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds. For example, he has been retained to pursue losses against mortgaged-backed securities trustees for failing to protect investors. He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

Mr. Scott is frequently quoted in the press, including in publications such as The Financial Times, The Economist, The Guardian, The Daily Telegraph, The Wall Street Journal, and Law360. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.



GARRETT WOTKYNS

PRACTICE EMPHASIS

Garrett W. Wotkins practices complex litigation with an emphasis on prosecuting ERISA, antitrust and plaintiff's-side business litigation matters.

ADMISSIONS

States of Texas, Arizona, and the District of Columbia; Various Federal Courts

EDUCATION

University of Chicago Law School (J.D., 1999); Rice University (B.A., History and English, with High Honors, 1996)

HIGHLIGHTS

- Served on University of Chicago Law School law review
- Law clerk for the Honorable John M. Duhe, Jr., United States Court of Appeals for the Fifth Circuit
- Chair, Antitrust Law Section, State Bar of Arizona
- Awarded "For Love of Justice" award by Arizona Volunteer Legal Program in recognition of pro bono legal work assisting Arizona homeowners facing foreclosure

REPRESENTATIVE CASES

- *Metropolitan Bank Group Inc. v. SunTrust Robinson Humphrey*: originated and led opt-out FINRA action representing regional bank against its broker-dealer concerning brokered sale of noncumulative Lehman preferred bonds; settled for confidential amount.
- *Bank of Nevada v. UBS*: originated and led representation of regional bank in FINRA action against its broker-dealer concerning brokered sale of synthetic CDO positions; settled for confidential amount. Awarded "For Love of Justice" award by Arizona Volunteer Legal Program in recognition of pro bono legal work assisting Arizona homeowners facing foreclosure.
- *Diebold v. Northern Trust and Louisiana Firefighters' Retirement System (LFRS) v. Northern Trust*: originated and helped lead two companion class actions, one on behalf of ERISA-governed retirement plans and investors, and the other on behalf of public employee plans and investors and other non-ERISA investors, alleging that defendant Northern Trust Investments and the Northern Trust Company breached their fiduciary duties to plaintiffs by imprudently investing Plaintiffs'



retirement savings in connection with Northern Trust's securities lending program. A combined settlement of \$60 million dollars was achieved.

- *Glass Dimensions, Inc. v. State Street Bank & Trust Co.*: originated and helped lead class action on behalf of ERISA-governed retirement plans and investors alleging that defendant State Street Bank & Trust Company breached its fiduciary duties to plaintiffs by imprudently investing Plaintiffs' retirement savings in connection with State Street's securities lending program. A settlement of \$10 million dollars was achieved.
- *In Re JPMorgan Stable Value Fund ERISA Litigation*: originated and helped lead ERISA class action on behalf of class of retirement investors in JPMorgan's Stable Value Fund. The case concerned the performance of several JPMorgan stable value funds that held mortgage-backed securities during the financial crisis. A settlement of \$75 million was achieved.
- *Bilewicz v. Fidelity Management & Research Co.*: originated and helped lead ERISA class action on behalf of class of retirement investors in Fidelity's employee 401(k) plan. A settlement of \$12 million was achieved.
- *Baylor College of Medicine v. Citigroup*: originated and helped lead opt-out FINRA action representing medical college against its broker-dealer concerning LIBOR-pegged interest



AMANDA LAWRENCE

PRACTICE EMPHASIS

Amanda F. Lawrence is actively engaged in the Firm's complex securities, corporate governance, consumer, and antitrust litigation.

ADMISSIONS

States of Connecticut and Massachusetts; United States Courts of Appeal: First and Ninth Circuits; United States District Courts: Southern District of New York, Connecticut, and Massachusetts

EDUCATION

Yale Law School (J.D., 2002); Dartmouth College (B.A., *cum laude*, 1998)

HIGHLIGHTS

Ms. Lawrence is a partner in our Connecticut office. In the antitrust realm, Ms. Lawrence served as co-lead counsel in the matter, *In re: GSE Bonds Antitrust Litigation*, No. 1:19-cv-01704-JSR (S.D.N.Y.) which alleged manipulation of the prices in the \$550 billion government sponsored entities bond market by some of the largest banks in the world. The case settled for \$386.5 million as well as requiring injunctive relief. Ms. Lawrence was also intricately involved in the "ISDAFix case" – *Alaska Electrical Pension Fund v. Bank of America*, 1:14-cv-07126-JMF-OTW (S.D.N.Y.). That achieved over \$504.5 million in recovery from large financial institutions for investors. Currently, Ms. Lawrence also works on *In Re Cattle Antitrust Litig.*, 0:22-md-03031-JRT-JFD (D. Minn.) and *In re European Governments Bonds Antitrust Litig.*, 1:19-cv-2601 (S.D.N.Y.), two large international antitrust actions.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements. For example, she served as co-lead counsel in *In re: Micro Focus International PLC Securities Litigation*, No. 18-cv-01549 (Cal. Super. Ct. San Mateo Cnty.), a California 1933 Act that settled for \$107.5 million. Other securities cases Ms. Lawrence has worked on include: *Police and Fire Retirement System of the City of Detroit v. Crane*, No. 13-cv-00945-VC (N.D. Cal.) (\$5.1 million securities class action settlement); *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million); *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.) (\$26 million securities class action settlement); *In re Fireeye, Inc. Securities Litigation*, No. 14-cv-266866 (Cal. Super. Ct. Santa Clara Cnty.); *St. Lucie Cnty. Fire Dist. Firefighters' Pension Trust v. Southwestern Energy Co.*, No. 4:16-cv-569 (S.D. Tex.); *In re LendingClub Corp. Shareholder Litig.*, No. CIV537300 (Cal. Super. Ct San Mateo Cnty.); and *In re TETRA Technologies, Inc. Securities Litig.*, No. 4: 07-cv-00965 (S.D. Tex.) (\$8.25 million securities class action settlement).



In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in the *The United States v. The City of New York*, No. 07-CV-2067 (E.D.N.Y.) that awarded back pay and lost fringe benefits to a class of African American and Hispanic firefighters in New York City, as well as a settlement in *In re Prudential Life Insurance Co. of America SGLI/VGLI Contract Litig.*, No. 11-02208 (D. Mass.) that brought a \$39 million settlement on behalf of families of deceased servicemen and women against Prudential.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events.

A five-time NCAA National Champion cyclist who raced throughout the United States, Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. Ms. Lawrence has competed in dozens of marathons, including the New York Marathon and the Boston Marathon, and in 18 full-distance ironman competitions – five of which were at the Ironman World Championships in Kona, Hawaii.



MARIO J. CACCIOLA

PRACTICE EMPHASIS

Mario J. Cacciola is an associate at the Firm's New York office and practices complex litigation with an emphasis on prosecuting ERISA and plaintiff's-side business litigation matters.

ADMISSIONS

State of New York; United States District Courts: Southern District of New York, Eastern District of New York

EDUCATION

Northwestern University School of Law (J.D., 2014); Boston University (M.A.T., History, 2007); College of the Holy Cross (B.A., Political Science, 2002)

HIGHLIGHTS

While at Northwestern University School of Law, Mr. Cacciola served as Executive Editor of the Journal of Technology and Intellectual Property. He also competed on the Northwestern University Trial Team.

Prior to joining Scott+Scott, Mr. Cacciola focused his practice in civil litigation regarding complex financial products. Mr. Cacciola has extensive experience in all aspects of litigation, including trial, and has represented clients in front of multiple regulators, including the SEC, CFTC, and FINRA. Mr. Cacciola is a member of the American Bar Association.

Outside of the office, Mr. Cacciola's passion lies in music, he has played drums for several local bands over the years and has recently taught himself guitar. He also enjoys cooking for his friends and family and has completed several half-marathons. His next goal is to complete the New York City marathon.

A former teacher, Mr. Cacciola also sits on the Associate Board of the New York chapter of a national education non-profit.

